

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Market Test of Experimental Product-
Metro Post

Docket No. MT2013-1

PUBLIC REPRESENTATIVE'S MOTION FOR
EXTENSION OF COMMENT DEADLINE

(October 9, 2014)

Pursuant to rules 16 and 21 of the Commission's rules of practice, the Public Representative hereby moves for an extension of time for submitting comments in this proceeding.

I. BACKGROUND

On September 25, 2014, the Commission established October 9, 2014 as the deadline for submitting comments in this docket.¹ A Chairman's Information Request was issued on October 2, 2014, with the Postal Service's response due no later than October 8, 2014.² The Postal Service has not yet responded to CHIR No. 2. See 39 C.F.R. § 3001.9(c)(1)(i).

II. ARGUMENT

The Public Representative seeks an extension of time for filing comments in order to allow interested persons sufficient time to consider the Postal Service's responses to CHIR No. 2. Without the clarifications provided by the Postal Service in response to CHIR No. 2, interested persons, including the Public Representative, cannot develop complete comments in this proceeding.

¹ PRC Order No. 2198, Notice and Order Concerning Request for Extension and Expansion of Metro Post Market Test, September 25, 2014.

² Chairman's Information Request No. 2, October 2, 2014 (CHIR No. 2).

The Commission routinely extends comment deadlines to allow interested persons time to prepare comments that take into consideration responses to information requests.³ In addition, the Postal Service also recognizes that interested persons may require additional time to prepare comments when responses to an information request are “extensive.”⁴

III. SPECIFIC RELIEF REQUESTED

The Public Representative respectfully requests that the Commission establish a deadline for comments that is two days (computed pursuant to rule 15 of the Commission’s rules of practice) after the date on which the Postal Service submits a complete response to CHIR No. 2.

Respectfully submitted,

/s/ Elisabeth S. Shellan

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³ See e.g., Docket Nos. MC2014-21 and R2014-6, Order No. 2049, Order Extending Comment Deadlines, April 14, 2014; Docket No. R2013-6, Order No. 1708, Order Extending Deadline for Comments, May 1, 2014; Docket Nos. MC2011-19 and R2011-3, Order No. 1684, Order Extending Time for Public Comment, March 27, 2013; Docket Nos. MC2011-16 and CP2011-53, Order No. 643, Order Extending Time for Comments, January 7, 2011.

⁴ Docket No. R2013-6, Response to Order Extending Deadline for Comments, May 2, 2014, at 1.